



Written Submission
for the
Royal Society for the Protection of Birds
Response to the Examining Authority's Report on the Implications
for European Sites

Submitted for Deadline 6
14 April 2025

Planning Act 2008 (as amended)

In the matter of:
Application by Morecambe Offshore Wind Limited for an Order
Granting Development Consent for the Morecambe Offshore Wind Farm

Planning Inspectorate Ref: EN010121
RSPB Registration Identification Ref: 20049971

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1. Introduction

- 1.1. The RSPB's response to the Examining Authority's questions to the RSPB set out in its Report on the Implications for European Sites of the proposed Morecambe Offshore Windfarm (dated 25 March 2025) are set out in the table below.

Responses to the Examining Authority's Report on the Implications for European Sites

Question ref	RIES question	RSPB response
Section 2.4: Likely Significant Effects – The applicant's assessment – offshore ornithological features		
RIESQ2	<p>[to JNCC, NRW(A), RSPB, NE, DAERA]</p> <p>The applicant's conclusions of no LSE with respect to the sites above were not disputed by any ANCB during the examination. Can JNCC, NRW(A), RSPB, NE, and DAERA confirm if they agree with the conclusions?</p>	<p>With the exception of the Irish Sea Front SPA (Manx Shearwater, due to concerns over baseline characterisation and impact assessment), the RSPB did not dispute the sites screened out based on the Applicant's conclusions of no likely significant effect.</p> <p>As set out below in response to RIESQ9, the RSPB is now in agreement with the Applicant that there is no AEol with regard the Manx Shearwater feature of the Irish Sea Front SPA.</p>
Section 3.3: Adverse effects on integrity: Pre-examination and examination matters – offshore ornithological features. Examination overview		
RIESQ9	<p>[to NE, JNCC, NRW(A), NatureScot and RSPB]</p> <p>Provide a clear update regarding agreement and disagreement in relation to AEol project alone and in-combination.</p>	<p>The following summarises the RSPB's position on AEol project alone and in-combination as set out in the most recent Statement of Common Ground (SOCG) between the Applicant and the RSPB (REP5a-033).</p> <p>Project alone</p> <p>The RSPB is in agreement with the Applicant in respect of project alone effects for all species except Manx Shearwater (SOCG Row 22.1).</p> <p>In-combination with other plans and projects</p> <p>The RSPB view is that there remain concerns on whether AEol can be ruled out for the following species and SPA combinations. Therefore, the RSPB disagrees with the Applicant on these conclusions (SOCG Row 23.1):</p> <ul style="list-style-type: none"> • Manx Shearwater (Copeland Islands SPA, Aberdaron Coast and Bardsey Island SPA, Skomer, Skokholm and the Seas off Pembrokeshire SPA, Rum SPA, Isles of Scilly SPA, St Kilda SPA). This is due to concerns regarding the baseline characterisation and impact assessment for Manx Shearwater which relate to wider industry limitations on these matters and are therefore not a project-specific issue. The RSPB has agreed with the Applicant to remove the Irish Sea Front SPA from its original list of SPAs it was concerned with in respect of AEol.

Question ref	RIES question	RSPB response
		<ul style="list-style-type: none"> • Lesser Black-Backed Gull (Morecambe Bay and Duddon Estuary SPA and the Ribble and Alt Estuaries SPA); and • Great Black-Backed Gull (Isles of Scilly SPA).
Section 3.3: Adverse effects on integrity: Pre-examination and examination matters – offshore ornithological features. Ornithology – overarching issues. In-combination effects when concluding no LSE project alone		
RIESQ19	<p>[to RSPB]</p> <p>Noting the comments in relation to this matter being outstanding at the close of examination, can RSPB confirm whether it is stating that it is unable to conclude no AEoI on the GBBG qualifying feature of the Isles of Scilly SPA.</p>	Yes. Please see response to RIESQ9 above.
Section 3.3: Adverse effects on integrity: Pre-examination and examination matters – offshore ornithological features. Table 3.2: Offshore ornithology. Key issues raised in the Examination etc		
RIESQ22	<p>ID 3.2.1: Manx shearwater (Irish Sea Front SPA, Copeland Islands SPA, Aberdaron Coast and Bardsey Island SPA, SSSP SPA, Rum SPA, Isles of Scilly SPA, St Kilda SPA)</p> <p>[To RSPB and applicant] provide an update on these matters.</p>	Please see response to RIESQ9 above.